

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

Crypto Infiniti, LLC,

Plaintiff,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,  
Pantheon Resources, Inc. and Hylmen, LLC,

Defendants.

C/A No.: 7:24-cv-04911-TMC

**RULE 26(f) PROPOSED  
DISCOVERY PLAN**

The parties, having consulted pursuant to Rule 26(f)(3), FED. R. CIV. P., hereby submit the following proposed discovery plan:

**1. What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made.**

RESPONSE: The parties have agreed in writing that they have waived the requirement to exchange Rule 26(a)(1) disclosures, pursuant to footnote 3 of the Court's December 6, 2024, Conference and Scheduling Order.

**2. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused upon particular issues.**

RESPONSE: Discovery will be needed in this case regarding matters that are typically the subject of discovery in civil cases. The parties are submitting a proposed Consent Amended Scheduling Order, providing that discovery shall be completed by July 25, 2025. The parties do not believe that discovery needs to be conducted in phases or be limited to focus on any particular

issues.

**3. Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.**

RESPONSE: None at this time.

**4. Any issues about claims of privilege or protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502.**

RESPONSE: None at this time.

**5. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed?**

RESPONSE: None.

**6. Any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) or (c).**

RESPONSE: The parties anticipate that they will seek a confidentiality order concerning, among other matters, the handling of alleged confidential information of the parties. The parties will submit a draft of the same for the Court's consideration. Pursuant to the parties' Rule 26(f) Report, the parties will also submit a Consent Amended Scheduling Order for the Court's consideration.

*[Signature Page Follows]*

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Dated: January 2, 2025